
IN RE:	:	Case No.: 19-12537
Ada Bundy	:	
	:	
Debtor(s)	:	Chapter 13

RESPONSE TO THE MOTION OF FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362

Comes Now, Ada Bundy, hereinafter referred to as "Debtor" by and through the undersigned counsel and in response to the Motion for Relief from the Automatic Stay and in support thereof avers as follows:

1. Admitted.
2. Denied.
3. Denied. It is strenuously denied that the existence and terms of a lease agreement were agreed upon or entered into. By way of further answer at all times relevant hereto the intent of the Debtor was and is to redeem the subject real property known as and located at 6608 North Smedley Street, Philadelphia, Pennsylvania through Chapter 13 Bankruptcy.
4. Denied. It is denied that the Debtor agreed to a lease and to a specific monthly amount or its terms.
5. Denied. It is Denied that any rent was agreed upon or due and owing.
6. Denied.
7. Denied.
8. Denied.

Dated: July 10, 2019

/s/Brad J. Sadek, Esquire
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